

REMARKS/ARGUMENTS

This paper is being provided in response to the Final Office Action dated November 16, 2004 for the above-referenced application. In this response, Applicant has amended Claims 51, 53, 68, 72, 74, 89, 93, 97, 100 in order to clarify that which Applicant deems to be the claimed invention. Applicant respectfully submits that the amendments to the claims are all supported by the originally filed application.

The rejection of Claims 67, 89, 93, 94, 97, 98 and 100 under 35 U.S.C. § 112, ¶2 has been addressed by Claim amendments provided herein in accordance with the guidelines provided in the Office Action. Accordingly, Applicant respectfully requests that this rejection be withdrawn.

The rejection of Claims 51-61, 63-67, 69-82, 84-88 and 90-100 under 35 U.S.C. § 102(e) as being anticipated by Draper et al. (U.S. Patent No. 5,924,096, hereinafter referred to as “Draper”) is hereby traversed and reconsideration thereof is respectfully requested. Applicant respectfully submits that Claims 51-61, 63-67, 69-82, 84-88 and 90-100, as amended herein, are patentable over the cited reference.

Claim 51, as amended herein, recites a method of viewing a visual form of data associated with tags comprising: selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data; opening the database; issuing a query to the database; providing a list of reports including the visual form of the data and associated tags corresponding to the query;

selecting at least one report from the list; constructing a named temporary file for each metafile corresponding to the at least one report selected; and executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile. Claims 52-61, 63-67, 69-71, and 93-96 depend from Claim 51.

Claim 72, as amended herein, recites a computer program product for viewing a visual form of data associated with tags comprising: machine executable code for selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data; machine executable code for opening the database; machine executable code for issuing a query to the database; machine executable code for providing a list of reports including the visual form of the data and associated tags corresponding to the query; machine executable code for selecting at least one report from the list; machine executable code for constructing a named temporary file for each metafile corresponding to the at least one report selected; and machine executable code for executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile. Claims 73-82, 84-88, 90-92, and 97-100 depend from Claim 72.

Draper relates to distributed database computer systems, and more particularly to distributed database system which uses indexed tags to track events according to type, to update

a cache database of database data items, to construct an update log on demand and to provide other capabilities. (Col. 1, Lines 8-12). Draper's Figure 2 includes a data index 200 and a set of data items 202. Each data item 202 has an associated tag 204. The data items 202 may include objects, records or other collections of data values. Each tag 204 value corresponds to an event in the history of the associated data item 202, such as the most recent update to the data item 202. Tags 204 are typically restricted to internal use. Suitable tags 204 include timestamps, version numbers, sequence numbers, update reference numbers, transaction counters, and other means of determining the relative order of operations on the data items 202. A transaction counter guarantees ordering of events and supports synchronization because the counter is received by a cache or other database copy from master database copy. (Col. 5, Lines 3-37). Draper discloses use of indexed tags for updating a cache and synchronizing replicas. (Col. 7, Lines 4-6). Draper's Figure 5 includes a step 520 in which a cache of data items 202 is updated using an event list. (Col. 7, Lines 59-60). Draper's Figure 6 includes two client caches 608 and 610. Each cache includes at least some of the data items 202. The cached data 612, 614 may be in the same format as the replicas, but this is not required. Each data item 202 in the master replicas 606 and each data item 202 in the cached data 612, 614 has a corresponding tag 204. To facilitate quick cache synchronization, the system 600 uses indexed tags 204. Tags 204 stored on a given master system 602 or 604 record the most recent changes that have occurred for each data item stored in that master system. A cache site can send a request to the master system 608 or 610 to get a list of the most recent events that occurred on data items 202 since the last time the cache made an inquiry. The list of events returned from the master system 602, 604 can be used to determine which operations should be performed on the cache 608, 610 to bring it into sync with the master system. (Col. 8, Lines 11-67).

Claim 51, as amended herein, is neither disclosed nor suggested by Draper in that Draper neither discloses nor suggests ***a method of viewing a visual form of data associated with tags comprising: selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data; opening the database; issuing a query to the database; providing a list of reports including the visual form of the data and associated tags corresponding to the query; selecting at least one report from the list; constructing a named temporary file for each metafile corresponding to the at least one report selected; and executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile,*** as set forth in Claim 51. Draper discloses use of tags such as timestamps, version numbers, sequence numbers, and the like, used to determine the relative order of operations on data items. Draper's tags may also include an event identifier to identify an event or set of events such as the creation or modification of a corresponding data item. However, Draper appears silent regarding any suggestion or disclosure of tags included in the visual form of data. Further, Draper appears silent regarding any disclosure or suggestion of a control file used in connection with viewing the visual form of data in which the control file includes the tags and includes the names of temporary files for each metafile. As support for ***executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file..***, as set forth in Claim 51, the Office Action cites Col. 4, Lines 18-22 and Figure 1, items 110 and 122 of Draper. Col. 4, Lines 18-22 of Draper disclose a system 100 of may include a local area network 102 which is connectable to other networks 104, including other LANs or

portions of the Internet or an intranet, through a gateway or similar mechanism. Element 110 is a network client and element 122 is a storage medium. Applicant respectfully submits that Draper, either in the foregoing citation or elsewhere, appears silent regarding any disclosure or suggestion of a control file that includes a tag contained in the visual form of data, or a name of a temporary file for each metafile.

Accordingly, Draper neither discloses nor suggests at least the features of *a method of viewing a visual form of data associated with tags comprising: selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data; ...; and executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile*, as set forth in Claim 51.

For reasons similar to Claim 51, Applicant's Claim 72, as amended herein, is also neither disclosed nor suggested by Draper in that Draper neither discloses nor suggests at least the features of *a computer program product for viewing a visual form of data associated with tags comprising: machine executable code for selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data;...machine executable code for executing a previewer program which accesses a control file to view said visual form of the data represented by*

metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile, as set forth in Claim 72.

In view of the foregoing, Applicant respectfully requests that the rejection be reconsidered and withdrawn.

The rejection of Claims 62 and 83 under 35 U.S.C. § 103(a) as being unpatentable over Draper in view of Vachey (U.S. Patent No. 5,630,120, hereinafter referred to as “Vachey”) is hereby traversed and reconsideration thereof is respectfully requested. Applicant respectfully submits that Claims 62 and 83 are patentable over the cited references, taken separately or in combination.

Claim 62 depends from independent Claim 51. Claim 83 depends from independent Claim 72. For reasons set forth above, Applicant’s Claims 51 and 72 are neither disclosed nor suggested by Draper. For reasons set forth below, Applicant also respectfully submits that combining Draper with Vachey also neither discloses nor suggests Claims 51 and 72, and claims that depend therefrom.

Claims 51 and 72 are summarized above.

Vachey relates to a method to help in optimizing a query from a relational data base management system. The method includes constructing a tree on the basis of the search for the execution plan of the query written in the RDBMS query language. The tree is representative of the execution plan of the query and the tree is represented on the screen. (See Abstract; Col. 1,

Lines 21-24; Col. 3, Lines 11-18). Figure 2B of Vachey illustrates a query menu of a log-on screen including a scrolling list 21. (Col. 5, Lines 34-35).

The Office Action on page 6 appears to cite Vachey as support that it was common practice to select a record from a list that resulted from querying a database, as taught in Vachey by optimizing a query from a relational database where a query scroller is used.

Claim 51 is neither disclosed nor suggested by the references, taken separately or in combination, in that the references neither disclose nor suggest at least the features of *a method of viewing a visual form of data associated with tags comprising: selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data; ...; and executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile*, as set forth in Claim 51. For reasons set forth above, Draper neither discloses nor suggests at least the foregoing recited features of Claim 51. Vachey also appears silent regarding any disclosure or suggestion of the foregoing features of Claim 51. Thus, Vachey does not overcome the deficiencies of Draper with respect to Applicant's amended Claim 51. Accordingly, the references do not disclose, teach or suggest at least the features of *a method of viewing a visual form of data associated with tags comprising: selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said*

tags is included in the visual form of the data; ...; and executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile, as set forth in Claim 51.

For reasons similar to those set forth regarding Claim 51, Applicant's Claim 72, as amended herein, is also neither disclosed nor suggested by the references, taken separately or in combination, in that the references neither disclose nor suggest at least the features of *a computer program product for viewing a visual form of data associated with tags comprising: machine executable code for selecting a database containing a plurality of reports wherein each report includes a visual form of the data corresponding to one of a print form of the data or a display form of the data and associated tags, wherein at least one of said tags is included in the visual form of the data;...machine executable code for executing a previewer program which accesses a control file to view said visual form of the data represented by metafile data included in said named temporary file, said control file including said at least one tag and a name of said named temporary file for each metafile, as set forth in Claim 72.*

In view of the foregoing, Applicant respectfully requests that the rejection be reconsidered and withdrawn.

Based on the above, Applicant respectfully requests that the Examiner reconsider and withdraw all outstanding rejections. Favorable consideration and allowance are earnestly solicited. Should there be any questions after reviewing this paper, the Examiner is invited to contact the undersigned at 617-248-4042.

Respectfully submitted,
CHOATE, HALL & STEWART



Anne E. Saturnelli
Registration No. 41,290

Date: February 16, 2005

Patent Group
CHOATE, HALL & STEWART, LLP
Exchange Place
53 State Street
Boston, MA 02109-2804
Tel: (617) 248-5000
Fax: (617) 248-4000